



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

December 20, 2016

**BY ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Joseph Percoco, Alain Kaloyeros, Peter Galbraith Kelly, Jr., Steven Aiello, Joseph Gerardi, Louis Ciminelli, Michael Laipple, and Kevin Schuler, 16 Cr. 776 (VEC)**

Dear Judge Caproni:

In an effort to expedite the production of voluminous discovery in this case, and to safeguard certain sensitive and/or confidential material, the Parties have agreed upon a proposed Protective Order to govern the discovery in this matter. A copy of the proposed Protective Order is enclosed for Your Honor's consideration. The Government intends to begin the production of discovery once a Protective Order is entered in this matter.

Respectfully submitted,

PREET BHARARA  
United States Attorney

By: /s Janis Echenberg  
Janis Echenberg/Robert Boone  
David Zhou/Matt Podolsky  
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cc (by ECF): Counsel for all defendants